

**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CRAIGVILLE TELEPHONE CO. d/b/a)	
ADAMSWELLS; and CONSOLIDATED)	
TELEPHONE COMPANY d/b/a CTC)	
)	
Plaintiff,)	No. 1:19-cv-07190
)	
vs.)	Judge John Z. Lee
)	Magistrate Judge Jeffrey T. Gilbert
T-MOBILE USA, INC.; and)	
INTELIQUENT, INC.)	
)	
Defendants.)	

**INTELIQUENT, INC.'S
OPPOSED MOTION FOR PROTECTIVE ORDER REGARDING
THE PLAINTIFFS' NOTICE OF RECORDS CUSTODIAN DEPOSITION**

Inteliquent, Inc. ("Inteliquent") respectfully moves pursuant to Federal Rule of Civil Procedure 26(c)(1) for a protective order to (i) set a single deposition of Inteliquent's Rule 30(b)(6) records custodian designee after the Court resolves the disputed topics and scope of the deposition; and (ii) sustaining Inteliquent's objections to the improper noticed topics and striking these 32 topics. The grounds for this motion are set forth in the accompanying memorandum of law. Pursuant to this Court's standing order, before filing this motion, Inteliquent's counsel asked the plaintiffs' counsel whether the plaintiffs object to the motion. The plaintiffs oppose this motion.

This motion complies with Local Rule 37.2. Inteliquent and the plaintiffs met and conferred on November 16, 2021 and November 30, 2021. The parties have been unable to resolve these disputes. Inteliquent files this motion to align as closely as possible with the schedule for T-Mobile USA, Inc.'s motion for protective order (ECF 177) in order for the Court to resolve all of the overlapping issues at the same time.

WHEREFORE, Inteliquent respectfully requests that this Court grant this motion, and

order any other such relief that the Court deems just and proper.

Dated: December 1, 2021

Respectfully submitted,

By: /s/ John J. Hamill

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CERTIFICATE OF SERVICE

The undersigned attorney, on oath, certifies that on December 1, 2021 he served the foregoing **Inteliquent, Inc.’s Opposed Motion for Protective Order Regarding the Plaintiffs’ Notice of Records Custodian Deposition** via the ECF system to all parties that have consented to same in accordance with applicable Federal Rules of Civil Procedure and Local Rules of the U.S. District Court for the Northern District of Illinois.

By: /s/ John J. Hamill

John J. Hamill